

Part C State Performance Plan (SPP) for 2005-2010

Overview of the State Performance Plan Development: see Overview of Kentucky's State Performance Plan Development Process document.

(The following items are to be completed for each monitoring priority/indicator.)

Monitoring Priority: **EFFECTIVE GENERAL SUPERVISION PART C / CHILD FIND**

Indicator 7 – Percent of eligible infants and toddlers with IFSP's for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline. (20 USC 1416(a) (3) (B) and 1442)

Measurement: Percent = # of eligible infants and toddlers with IFSP's for whom an evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline divided by # of eligible infants and toddlers evaluated and assessed times 100. Account for untimely evaluations.

Overview of Issue/Description of System or Process:

The 45-day timeline measurement system for Kentucky includes:

1. Policies and procedures to guide meeting the 45-day timeline
2. Provision of training and technical assistance supports to Point of Entry Staff in meeting the 45-day timeline, data collection, reporting and use
3. Quality assurance monitoring procedures to ensure the accuracy of the 45-day timeline data
4. Data system elements for 45-day timeline data input and maintenance, and 45-day timeline data analysis functions

Each of these is described below:

Kentucky regulations outline many timelines and procedures for Points of Entry (POE) and providers to ensure that IFSP's are initiated within the Part C required forty-five (45) days (see 911 KAR 2:110 – POE; 911 KAR 2:120 – Evaluation). 911 KAR 2:110 is the Kentucky regulation pertaining to the Point of Entry (POE) responsibilities in meeting the Part C 45-day timeline requirement. These regulations include, but are not limited to, family contact, initial screening, family visitation, explanation of the First Steps program, arranging appropriate evaluation/assessment, and assisting the family to identify their Primary Service Coordinator (PSC) and necessary service providers. 911 KAR 2:120 is the Kentucky regulation pertaining to evaluation including, but not limited to, the evaluator's responsibility for scheduling, documentation, and necessary timelines in order to meet the required Part C 45-day timeline.

All children are referred to one of fifteen (15) District Point of Entry (POE) offices. The staff at the POE is responsible for all Child Find and intake duties necessary to ensure that children are referred and that those referrals are acted upon in a timely, appropriate manner (see 911 KAR 2:110). This regulation includes, but is not limited to, coordinating Child Find efforts with other state and federal programs, developing a Child Find activity plan, providing public awareness activities, and acting upon referrals. The Point of Entry staff takes the referrals, screens, arranges the Primary Level Evaluations that determine eligibility where required, arranges assessments of those children with established risk diagnoses, arranges any additional recommended assessments, and facilitates the initial IFSP. They also help the family choose the Primary Service Coordinator (PSC) who is responsible for all service coordination until the child exits the First Steps program.

At the POE level, Kentucky has implemented a new intake system utilizing the Developmental Observation Checklist System (DOCS). The DOCS makes use of a series of questions in the areas of motor development, social development, language development, and cognitive development to identify those children whose development might be delayed in one or more of these areas. This tool has a high sensitivity rate, meaning that many children are initially identified as possibly delayed who ultimately are found to be “normal” in their development. This means there is a good degree of certainty that those children who are found to be without delay on the DOCS are truly “normal” in their development. This tool is designed to more effectively identify those children who will go on to need First Steps services (911 KAR 2:110, section 1 (6) (c) 4). By identifying those children without developmental delay who do not need early intervention services, this screening tool thereby allows POE staff to focus their attention and resources on meeting the 45-day time frame for those children with suspected delays. If the child passes the screening but the parents still have concerns, they are allowed to continue with the evaluation process.

The state of Kentucky also has in effect a timely, comprehensive, multidisciplinary evaluation system to assess the functioning of each infant or toddler with a disability in the State (911 KAR 2:120) as well as a means of family-directed identification of the needs of such children and families (Routine Based Interview). 911 KAR 2:120 is the Kentucky regulation pertaining to evaluation including, but not limited to, medical and developmental components of the evaluation/assessment and timelines in order to meet the Part C required 45-day timeline. The routine based interview is an interview process that helps the family identify their current needs/concerns by looking at the child's/family's daily routine and where within those routines the family has difficulty/concerns. Based upon the family's identified concerns, the team decides the most appropriate discipline to address the child's/family's needs.

1. Policies and procedures to guide meeting the 45-day timeline

Within 911 KAR 2:120 Kentucky has a regulation stating that the IFSP will be written within forty-five (45) days. There are also additional regulations, that when followed assist in meeting the Part C required 45-day timeline. These regulations include:

- The Point of Entry (POE) will make contact with the family by telephone or letter within five (5) days from the date of referral.
- If the POE is unable to contact the family by telephone (or gets no response from the letter sent above) within ten (10) working days from the date of referral, a letter is sent to the family.
- The POE staff will coordinate the evaluation process for eligibility determination (Primary Level Evaluation or Five Area Assessment) within the timeline of 45 days from receipt of referral.
- Evaluation/assessment (PLE or 5-Area) will be completed and returned to the POE within fourteen (14) calendar days from the date of referral to the evaluator.
- The therapist(s) has ten (10) working days from the date of referral to complete the necessary assessments and return them to the POE.

2. Provision of training and technical assistance supports to administrators and service providers in meeting the 45-day timeline, reporting, and use

Kentucky's current providers have already been trained on the regulations and policies and procedures regarding evaluation, assessment, and initial IFSP meetings as they relate to the Part C 45-day timeline. New providers entering the First Steps system will receive training by the Technical Assistance Teams during the required 1-day orientation module. Initial service coordinator training provided includes:

- POE quarterly training.
- Initial five (5) day orientation for new POE staff.

- Mentoring of new POE staff by experienced POE staff.
- Mandatory PSC quarterly meetings.
- POE coordinator within the Central Office.
- Technical assistance provided by the Technical Assistance Teams with administrative support from the Central Office.

3. Quality assurance and monitoring procedures to ensure the accuracy of the 45-day timeline data

Kentucky currently monitors Point of Entry offices on meeting the 45-day timeline per state and federal regulation. From July 1, 2004 through June 30, 2005, Kentucky's monitoring system reviewed one (1) of the fifteen (15) Point of Entry programs. The one (1) Point of Entry that was reviewed was not cited for noncompliance with the 45-day timeline. The Point of Entry that was reviewed was the FIVCO district, which you will see from our data below had the highest percentage of meeting the 45-day timeline. Obviously, none of the charts that exceeded the 45-day timeline happened to be in those randomly selected by the Evaluator. In the future, Program Evaluators will do bi-annual evaluations on all Point of Entry Program sites to more closely monitor and ensure compliance with the 45-day timeline.

4. Data system elements for the 45-day timeline data input and maintenance, and 45-day timeline data analysis functions

Data on each child is reported on a data form by the Service Coordinator to Central Billing Information Systems (CBIS). It is entered manually by data entry personnel at CBIS into fields designed to capture the data. A query is done on the data collected to obtain the information regarding the percent of infants and toddlers with IFSP's for whom an evaluation, assessment, and initial IFSP meeting were conducted within the Part-C required 45-day timeline.

Baseline Data for FFY 2004 (2004-2005):

The percent of children who had a timely IFSP between July 1, 2004 and June 30, 2005 in Kentucky was 36% (see figure 1). This is out of compliance with federal mandates. In 2003, the percentage was 34%, and in 2004 it was 40%.

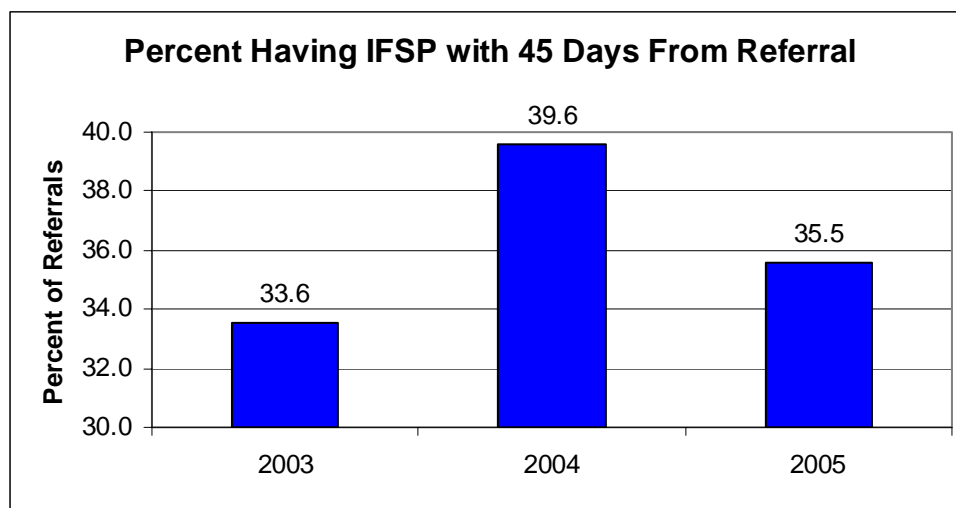


Figure 1

During August 2005, a survey was sent to each Point Of Entry (POE) office on every child who had not achieved an IFSP in 45 days between July 1, 2004 and June 30, 2005. A total of 2,174 surveys were sent, and 2,137 were returned. On the survey, initial service coordinators (ISC's) were asked a short series of questions about each child regarding why the IFSP was not completed within 45 days. ISC's most often indicated that the child, family, or state guardian was not available (60%; see figure 2) as the reason most IFSP's were not completed within the 45-day timeline. Families were not available for a variety of reasons including not having phones which made confirming appointments difficult, not being home for scheduled appointments, canceling appointments, failing to return contact attempts by phone or letter, and taking vacations to name a few. The second most common reason cited was a shortage of ISC's (29%). In one district, an ISC died suddenly, creating a shortage. Strategies in this SPP document will address the need to increase the number of ISC's. Thirdly, assessment reports were frequently delayed (19%). This was sometimes due to the child needing multiple assessments. ISC's also cited difficulties scheduling providers (19%). Kentucky has a large number of independent, contracted providers who primarily provide services in the home. While this is a wonderful opportunity to provide services in the natural environment, it makes scheduling more difficult. Finally, the last reason cited more than 10% of the time was a delay in receiving primary level evaluation (PLE) reports (17%). For children without an established risk, these reports are required to determine eligibility and so evaluators are greatly in demand.

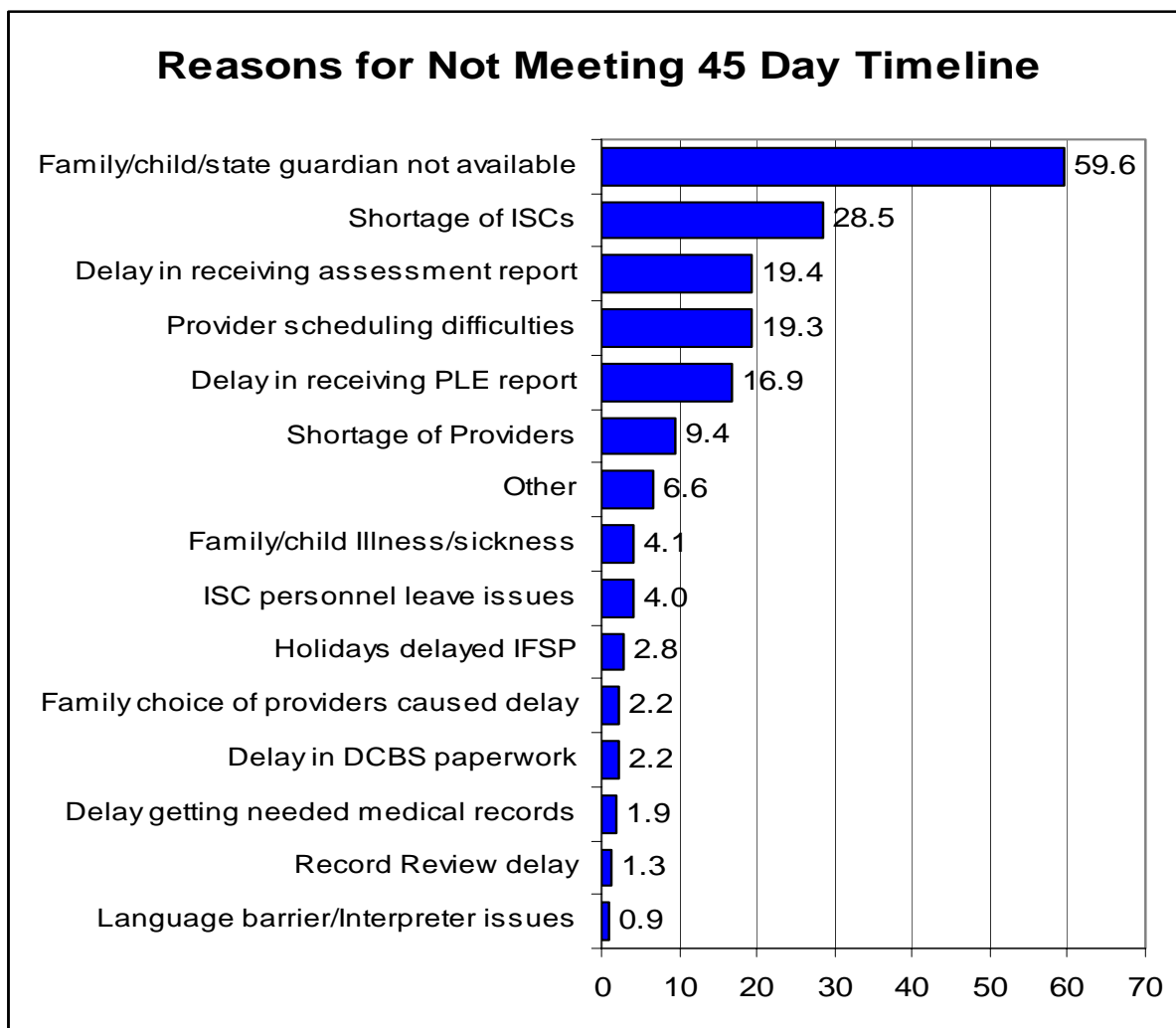


Figure 2

When all July 1, 2004 to June 30, 2005 IFSPs are taken into consideration with regard to the 45 day timeline and the source of the delay in meeting the timeline (if any), the data (see figure 3) show that 55% either met the timeline or had a delay in meeting the timeline driven solely by the family (family out of town, family didn't return phone calls or respond to letters, birth of new baby in family, family/child illness, etc.). An additional 19% had a combination of factors causing the delay: family driven delays (family out of town, family did not respond to phone calls or letters, etc.) along with delays caused for other reasons out of the family's control (shortage of providers, illness/leave of initial service coordinator, delay in receiving medical records, etc.). Finally, 26% were delayed beyond 45 days for reasons not caused by the family at all (i.e. delay in receiving assessment report, provider scheduling difficulties, shortage of ISCs, etc.).

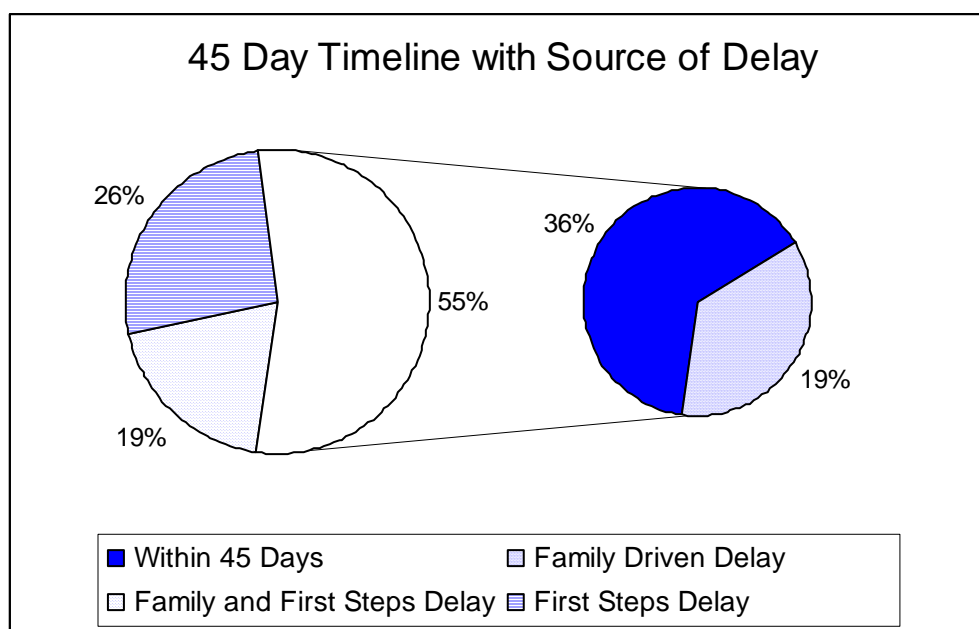


Figure 3

Since intake in Kentucky occurs in 15 regional (district) Points Of Entry (POE), it is noteworthy to look at the differences between the districts on this indicator (see figure 4). Some districts do a much better job of getting IFSP's completed within the 45-day timeframe than others. FIVCO, one of Kentucky's easternmost districts did the best job of getting IFSP's completed on time (84%; see figure 4). However, all districts fall short of the federally mandated goal of 100%. Only 3 districts managed to have a majority of their IFSP's completed on time: Lake Cumberland (61%), Fivco (84%) and Buffalo Trace (71%). Lincoln Trail, a district in which there was a significant ISC shortage, managed to complete only 7% of their IFSP's within 45 days.

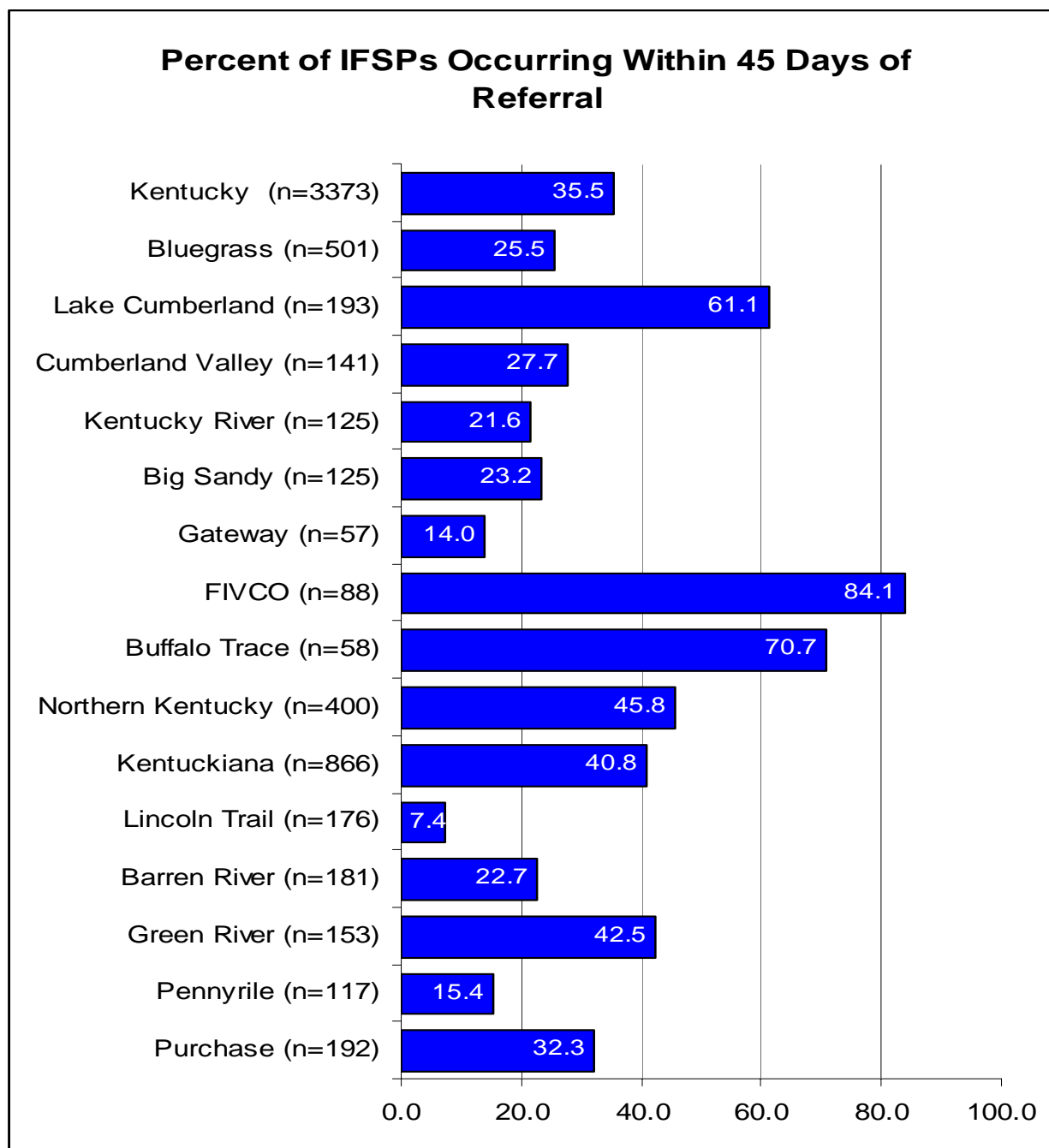


Figure 4

Districts also varied as to the reason they gave for IFSP's going beyond the 45-day timeline (see figure 5). Kentuckiana, the most urban of all Kentucky districts, most often gave the unavailability of the family, child, or state guardian as the reason for the delay (72%). For Lincoln Trail, with the lowest percentage of children achieving IFSP within 45 days, family unavailability was only cited in 10% of cases.

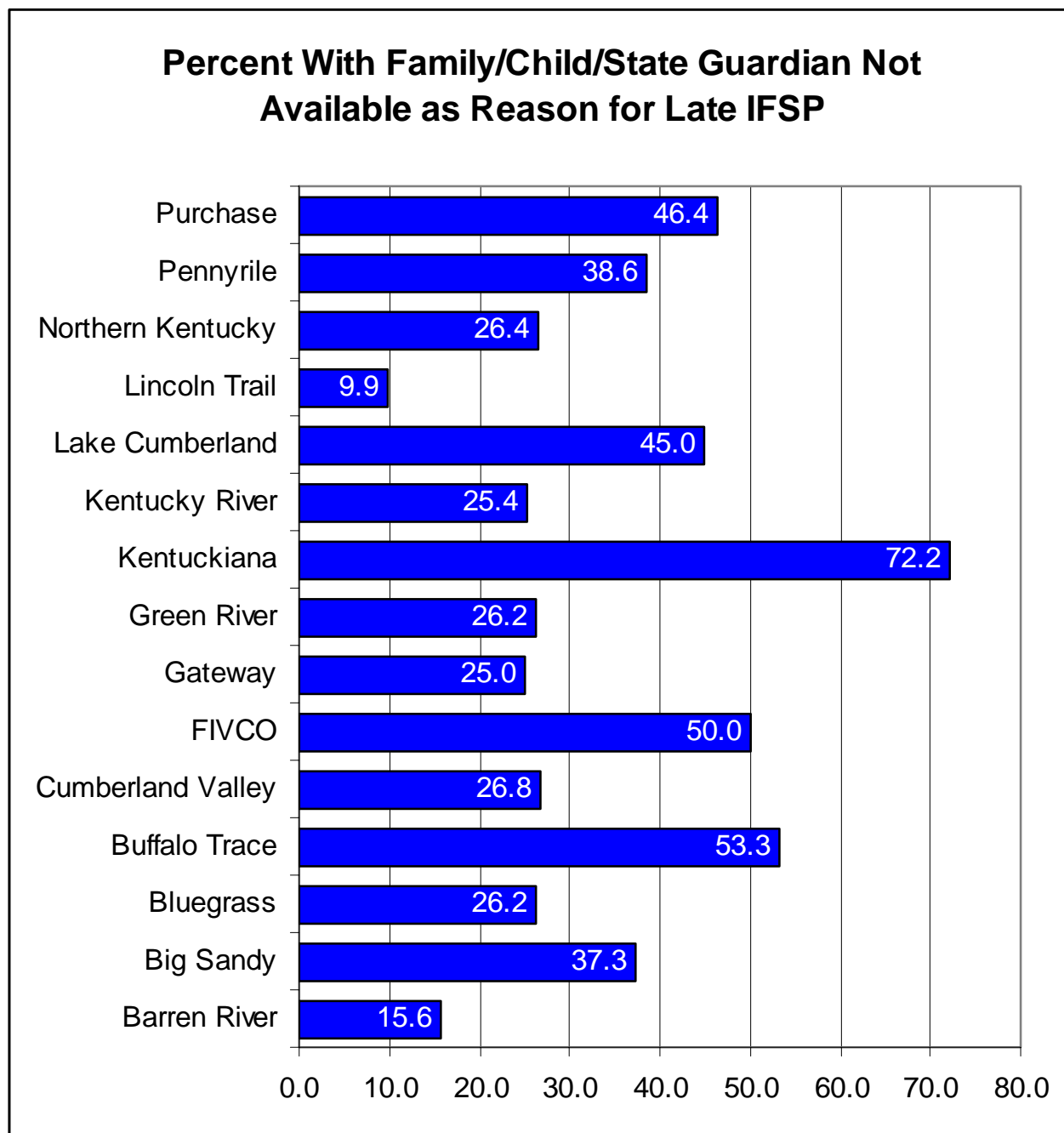


Figure 5

Some districts did experience a shortage of initial service coordinators (see figure 6). These districts are shown in figure 6, below. Lincoln Trail had the most difficulty completing IFSP's on time because of this shortage (86% of late IFSP's). Cumberland Valley (35%), Northern Kentucky (22%), Bluegrass (19%), Barren River (12%) and Kentuckiana (10%) also experienced significant ISC shortages.

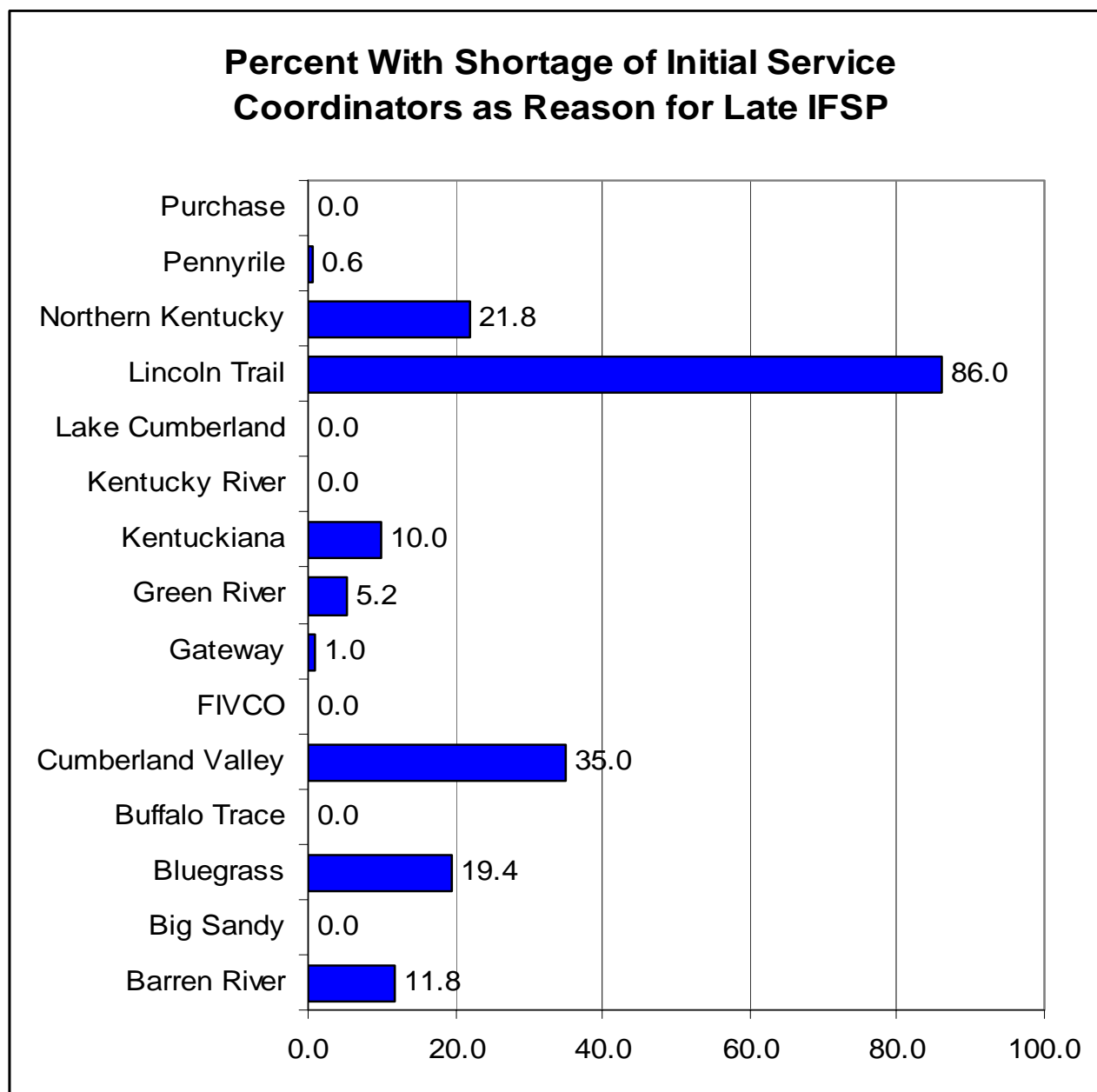


Figure 6

For individual districts, the data are varied (see figure 7). For Fivco district, 92% of all IFSPs either met the 45-day timeline or were delayed solely for family-driven reasons. In Lincoln Trail, this number was only 11.5%. Other districts fell somewhere in-between.

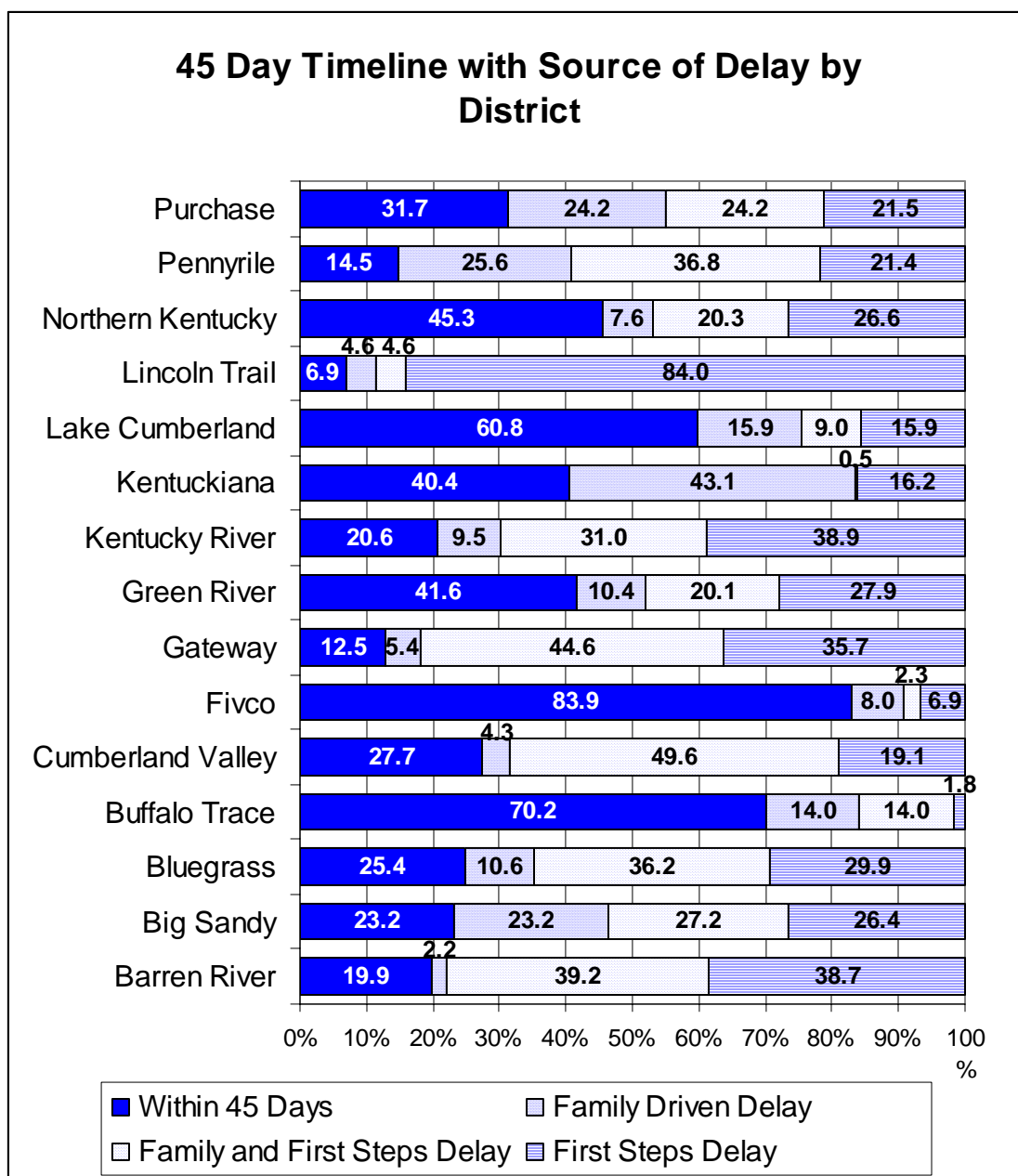


Figure 7

It is useful to note the data (see Figure 8) regarding initial contact required by the Initial Service Coordinator (ISC). 911 KAR 2:110 Section 1(6)(c) states “If it is determined that the referral is appropriate, POE staff shall contact the family by telephone or letter within five (5) working days...” The survey sent to ISC’s for children with late IFSP’s asked “Did you attempt to contact this family within 5 days of the referral date to inform them about First Steps services, advise them that the services were voluntary, and ask if they would like to schedule a home visit?” Results are shown below in Figure 8. For those with late IFSP’s, ISC’s made the initial contact attempt within (5) five days 85% of the time. An additional 12% made a late initial contact, and 3% reported no initial contact.

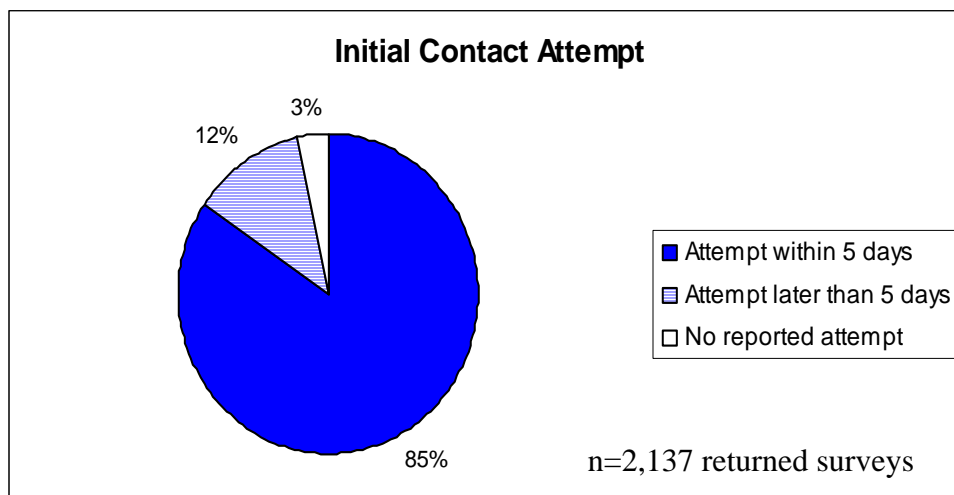


Figure 8

911 KAR 2:110 Section 1(6)(f) states that “If efforts to contact the family by telephone and in writing fail, in order to bring closure to the referral the POE staff shall send a follow-up letter within ten (10) working days of the referral encouraging the family to contact the POE at anytime.” The survey sent to the points of entry also asked “Did you make a follow-up contact attempt by letter within 10 days from the referral date?” Results are shown below in Figure 9. Most (83%) did not require a follow-up letter because contact had already been established. Ten percent did have a follow-up letter sent by the Point Of Entry within 10 days, while 2% received a letter later than 10 days. An additional 5% did not report sending a follow-up letter.

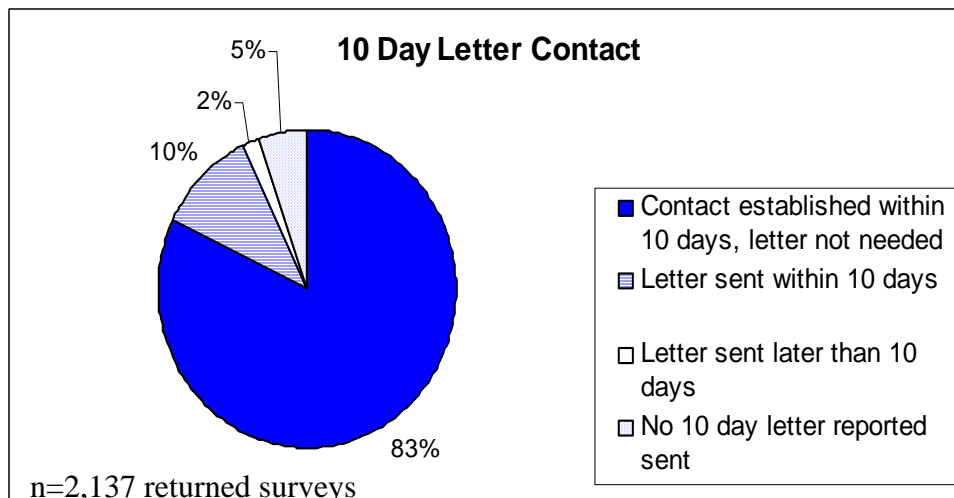


Figure 9

Discussion of Baseline Data: Comparison data and discussion is included with the charts above.

FFY	Measurable and Rigorous Target
2005 (2005-2006)	100% of eligible infants and toddlers in Kentucky will have evaluation, assessment and an initial IFSP meeting conducted within Part C's 45-day timeline.
2006 (2006-2007)	100% of eligible infants and toddlers in Kentucky will have evaluation, assessment and an initial IFSP meeting conducted within Part C's 45-day timeline.
2007 (2007-2008)	100% of eligible infants and toddlers in Kentucky will have evaluation, assessment and an initial IFSP meeting conducted within Part C's 45-day timeline.
2008 (2008-2009)	100% of eligible infants and toddlers in Kentucky will have evaluation, assessment and an initial IFSP meeting conducted within Part C's 45-day timeline.
2009 (2009-2010)	100% of eligible infants and toddlers in Kentucky will have evaluation, assessment and an initial IFSP meeting conducted within Part C's 45-day timeline.
2010 (2010-2011)	100% of eligible infants and toddlers in Kentucky will have evaluation, assessment and an initial IFSP meeting conducted within Part C's 45-day timeline.

Improvement Activities/Timelines/Resources:

IMPROVEMENT ACTIVITY	TIMELINE	RESOURCES
1. When there is an ISC vacancy, require contractors to recruit a replacement quickly, then have TA Team provide one-on-one training to newly hired ISC, so they can begin providing services sooner and not have to wait for the next regularly scheduled training module.	July 2005	Technical Assistance Teams; Training Coordinator; POE Coordinator; POE Contractors
2. Have staff position that provides supervision/oversight to Primary Level Evaluators to further ensure that evaluations are completed timely.	August 2005	Part C Coordinator; Evaluation Coordinator

SPP Template – Part C (3)

KENTUCKY

State

3. Gather monitoring data on each POE relative to the 45 day timeline; analyze for problem areas.	July 2005 - June 2006	Program Evaluators; Quality Assurance Administrator
4. Provide training to POE's on any problems identified by monitoring of 45-day timeline.	July 2005 - June 2006	Technical Assistance Teams
5. Provide training to the agencies who hold Point of Entry contracts on the requirement of the 45-day timeline	July 2005 – June 2006	Point of Entry Coordinator; Part C Coordinator
6. Provide training to all providers on the requirement of the 45-day timeline to increase awareness of all providers contribution to meeting this requirement	July 2005 – June 2006	Technical Assistance Teams; Training Coordinator
7. Investigate requiring semi-annual meetings/trainings for all providers in order to provide training/technical assistance on the 45-day timeline and other important issues.	July 2006 – June 2007	Part C Coordinator; Technical Assistance Teams
8. Investigate establishment of eligibility pathways for children with the following conditions: medically fragile, social communication delay/autism spectrum, deaf/blind, and extreme prematurity.	July 2006 – June 2007	Part C Coordinator; Point of Entry Coordinator; and a workgroup
9. Investigate changing the state regulation time line for evaluation from 14 calendar days to 10 calendar days and the assessment time line from 10 working days to 10 calendar days.	July 2006 – June 2007	Part C Coordinator; Evaluation Coordinator; Quality Assurance Administrator
10. Recruit and retain adequate supply of service providers to meet evaluation, assessment and initial service coordination needs.	July 2007- June 2008	Technical Assistance Teams; DEIC's; Point of Entry staff
11. Investigate the development of standard forms for all formal First Steps processes/procedures that meet state criteria. (i.e. discharge summaries; intake forms; progress notes, etc.)	July 2008 – June 2009	Part C Coordinator; Technical Assistance teams and a workgroup
12. Investigate having Points of Entry also do Primary Level Evaluations in order to shorten the time requirements for evaluation.	July 2008 – June 2009	Evaluation coordinator; Point of Entry Coordinator; and a workgroup.